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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
THOMAS J. PARDINI IN SUPPORT
OF DEFENDANTS'
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THEIR
RESPONSE TO WAYMO'S OFFER OF
PROOF RE DEVELOPMENT
EXPENSES AND EXHIBITS
THERETO**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal
4 knowledge and if called as a witness, I could and would competently testify to the matters set
5 forth herein. I make this declaration in support of Defendants' Administrative Motion to File
6 Under Seal Their Response to Waymo's Offer of Proof Re Development Expenses and Exhibits
7 Thereto.

8 2. I have reviewed the following documents and confirmed that only the portions
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Response to Offer of Proof re Development Expenses ("Response")	Highlights	Plaintiff
Exhibit 1	Highlights	Plaintiff
Exhibit 3	Entire Document	Plaintiff
Exhibit 4	Highlights	Plaintiff

17 3. The highlighted portions of the Response, Exhibit 1, and Exhibit 4, as well as the
18 entirety of Exhibit 3, contain information that has been designated "Highly Confidential –
19 Attorneys' Eyes Only" or "Confidential" by Waymo in accordance with the Patent Local Rule 2-
20 2 Interim Model Protective Order ("Protective Order"), which the parties have agreed governs
21 this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in
22 accordance with Paragraph 14.4 of the Protective Order.

23 4. Defendants' request to seal is narrowly tailored to the portions of their Response
24 and supporting exhibits that merit sealing.
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1 I declare under penalty of perjury that the foregoing is true and correct. Executed this
2 28th day of January, 2018 in San Francisco, California.

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4 /s/ Thomas J. Pardini
Thomas J. Pardini
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8 **ATTESTATION OF E-FILED SIGNATURE**

9 I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this
10 Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Thomas J. Pardini has
11 concurred in this filing.
12

13 Dated: January 28, 2018

/s/ Michael A. Jacobs
MICHAEL A. JACOBS
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